

IN THE CIRCUIT COURT OF THE COUNTY OF ST. CHARLES
STATE OF MISSOURI

STATE OF MISSOURI,

)

Plaintiff,

)

Case No. 2311-CR04218

)

vs.

)

Division: 9

)

NIKHIL V. PENMATSA,

)

Defendant.

)

MOTION TO SET BOND

Comes now Defendant Nikhil V. Penmatsa, by and through his counsel, Daniel J. Bruntrager, of Bruntrager & Billings, P.C., and respectfully requests that bond in the amount of \$50,000.00 be set in this matter with 10% allowed. In support thereof, Defendant states the following:

1. That this case was filed on November 30, 2023. A warrant was issued and it was ordered that Defendant was to be held without bond.
2. The Court should take into consideration the accused's family ties in the area and the fact that he has been in this country for five years.
3. The Defendant completed college at Lindenwood University and currently has a valid work permit.
4. That the Defendant does not pose a flight risk and is willing to surrender his passport.
5. Defendant will have no contact or communication whatsoever with the complaining witness.
6. Defendant asserts that if he is released on bail, under no circumstances will he attempt to flee. Moreover, he will comply with any and all conditions of bail set by this Court.

Wherefore, having fully pled, the Defendant respectfully requests that the Court set bond in this matter at \$50,000.00 with 10% allowed, modify and amend the conditions of the 06 and for such other and further relief as this Honorable Court may deem just and proper.

Respectfully Submitted,

BRUNTRAGER & BILLINGS, P.C.

/s/ Daniel J. Bruntrager
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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of December, 2023, the foregoing **Motion to set Bond** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Daniel J. Bruntrager